

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CVS HEALTH CORPORATION AND SUBSIDIARIES,))
)	Case No. 1:23-cv-00492-MSM
Plaintiff,))
v.))
UNITED STATES OF AMERICA,))
Defendant.))
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JOINT PROPOSED DISCOVERY PLAN

The parties met and conferred by videoconference on April 5, April 30, and May 10, 2024, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure. The parties addressed the topics set forth in Rule 26(f) during the course of their videoconferences.

The parties propose the following discovery schedule:

	<u>Deadline</u>
Rule 26(a)(1) Initial Disclosures:	May 30, 2024
Completion of Fact Discovery:	November 28, 2025
Rule 26(a)(2) Expert Witnesses Disclosures:	December 29, 2025
Rebuttal Expert Witness Disclosures:	January 29, 2026
Completion of Expert Discovery:	May 29, 2026

With respect to depositions taken pursuant to Rule 30 of the Federal Rules of Civil Procedure, the parties propose increasing the number of depositions that may be taken by a party without leave of the Court from 10 to 30 depositions. Further, the parties propose that, unless otherwise agreed, all depositions, whether taken in the District of Rhode Island or outside of the district, shall be taken in person, where practicable.

With respect to interrogatories propounded pursuant to Rule 33 of the Federal Rules of Civil Procedure, the parties propose to increase the number of interrogatories that a party may serve on the other party from 25 to 75.

Pursuant to Fed. R. Civ. P. 5(b)(2)(E), the parties agree that service on a party in this case may be made by email and by secure file transfer protocol (such as the United States' Justice Enterprise File Sharing system) to the party's counsel of record, or by any other means permitted by Fed. R. Civ. P. 5(b).

Additionally, pursuant to Fed. R. Civ. P. 5(b)(2)(F), the parties agree that service on a party may be made by using a private delivery service such as FedEx or DHL to send materials to that party's counsel of record, or by any other means permitted by Fed. R. Civ. P. 5(b).

Dated: May 16, 2024

Respectfully submitted,

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered participants.

/s/ James E. Weaver
James E. Weaver